

## REMARKS

Reconsideration of this application, as amended, is respectfully requested.

Claims 1, 3-9, and 11-14 are pending. Claims 1, 3-9, and 11-14 have been rejected.

Claims 1, 7, and 9 have been amended. No claims have been canceled. No claims have been added. Support for the amendments is found in the specification, the drawings, and in the claims as originally filed. Applicants submit that the amendments do not add new matter.

Applicants reserve all rights with respect to the applicability of the Doctrine of Equivalents.

Claims 1, 3-9, and 11-14 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite.

Claims 1, 7, and 9 have been amended to overcome Examiner's rejection under 35 U.S.C. § 112, second paragraph.

Given that claims 3-8, and 11-14 depend from amended claims 1, 7, and 9 respectively, applicants respectfully submit that the Examiner's rejection under 35 U.S.C. § 112, second paragraph with respect to claims 1, 3-9, and 11-14 has been overcome.

Claims 1, 3-9, and 11 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,785,704 to McCanne et al. ("McCanne.2") in view of Partridge et al., "Host Anycasting Service" ("Partridge").

Applicants reserve the right to swear behind McCanne.2.

The Examiner stated that "the information object repository is selected according to specified performance metrics by mapping a client address to repository addresses using a WILD protocol that runs on top of a Transmission Control Protocol...does not overcome McCanne.2 and ...US.6415.323 [to McCanne et al., ("McCanne")] (Office Action, 1/7/08, page 2).

Applicants respectfully disagree.

Applicants have amended claim 1 to read as follows:

A method, comprising:

receiving, at an information object repository, a request from a client for an information object at an address identified by a uniform resource locator (URL);

mapping the URL to a corresponding anycast address for the information object, wherein the information object repository is selected according to specified performance metrics by mapping an address of the client to one or more addresses of information object repositories and to one or more addresses of routers that have a best type-of-service distance to the address of the client using by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP);

determining whether the anycast address can be resolved into a real unicast address that is uniquely identified for the information object in the Internet; resolving the anycast address for the information object to the unicast address for the information object, if the corresponding anycast address can be resolved into the unicast address, wherein resolving the anycast address comprises sending an anycast resolution query to the anycast address according to an anycast address resolution protocol (ARP);

returning a failure if the anycast address cannot be resolved into the unicast address; and

obtaining a copy of the information object using the resolved unicast address.

(emphasis added)

McCanne discloses a proximity-based redirection system. More specifically, McCanne discloses:

The client initiates a normal application connection using the anycast address, e.g., a Web page request using HTTP over TCP on port 80 or a streaming media request using RTSP over TCP port 554.

As a side effect of the anycast routing infrastructure described above, the client's packets are routed to the nearest ARN advertising reachability to the address, thereby initiating a connection to that ARN. The ARN is prepared to accept requests for each configured service, e.g., Web requests on port 80.

At this point, if the data is available and is of a transactional nature, then the ARN can either respond with the content directly or redirect the requesting client to a service node as follows:

The ARN selects a candidate service node S from its associated service cluster. The selection decision may be based on load and availability information that is maintained from a local monitoring protocol as described above.

(McCanne, col. 15, line 60-col. 16, line 17)(emphasis added)

In particular, McCanne discloses:

In this embodiment, there are three steps to performing wide-area redirection:  
ARNs discover candidate service nodes.  
ARNs measure network path characteristics between each service node and itself.  
ARNs query service nodes for their health.

Given information obtained from the above steps, ARNs can choose the service node that is likely to provide the best quality of service to any requesting client. To do so, each ARN maintains an information database containing load information about some number of eligible service nodes. The ARN consults its information database to determine the most available service node for each client request. To maintain its load information, an ARN can actively probe network paths and service nodes. Alternatively, service nodes can monitor network load and internal load, and report load information to their respective ARNs.

(McCanne, col. 17, lines 45-58)(emphasis added)

Thus, McCanne discloses referral nodes that monitor load and availability of the service node, query the service nodes [communication between the referral node and the service node], maintain the database containing such load information, and select the service node from the database. McCanne fails to disclose, teach, or suggest mapping an address of the client to one or more addresses of information object repositories and to one or more addresses of routers that have a best type-of service distance to the address of the client by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

McCanne.2, in contrast, discloses the following:

To properly load balance server and computational resources, the CDSR redirector monitors the local servers 201 and 202 via communication paths 205 and 206, respectively, or the CDSR can received load updates across an application-level multicast group as described above. Thus, the CDSR redirector can make informed decisions as to where to redirect clients based on server load. If the entire local service facility becomes fully loaded, the CDSR redirector may decide to redirect the client deeper into the network to servers not shown in the diagram. This decision can be based on information provided by the alternate servers (e.g., their availability and load) which can be communicated across the wide area, e.g., via path 208.

(McCanne.2, col. 27, lines 1-13)(emphasis added).

Thus, McCanne.2 merely discloses redirecting the clients based on server load and based on information provided by the alternate servers. McCanne.2, similarly to McCanne, fails to disclose, teach, or suggest mapping an address of the client to one or more addresses of

information object repositories and to one or more addresses of routers that have a best type-of-service distance to the address of the client by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

Partridge, in contrast, discloses host anycasting service, and similarly to McCanne and McCanne.2, fails to disclose the discussed limitations of amended claim 1.

Because McCanne, McCanne.2 in view of Partridge fails to disclose all limitations of amended claim 1, applicants respectfully submit that claim 1, as amended, is not anticipated under 35 U.S.C. § 102(e) by McCanne.2, McCanne in view of Partridge.

Given that claims 3-9 and 11 contain limitations that are similar to those limitations discussed with respect to amended claim 1, applicants respectfully submit that claims 3-9 and 11 are not anticipated under 35 U.S.C. § 102(e) by McCanne.2, McCanne in view of Partridge.

Claims 1, 3-9, and 11 have been rejected under 35 U.S.C. § 102(e) as being anticipated by McCanne.2 in view of Bhattacharjee et al., “Application-Layer Anycasting” (“Bhattacharjee”). Applicants reserve the right to swear behind McCanne.2 and Bhattacharjee.

Bhattacharjee, in contrast, discloses application-layer anycasting, and similarly to McCanne.2 and McCanne, fails to disclose, teach, or suggest mapping an address of the client to one or more addresses of information object repositories and to one or more addresses of routers that have a best type-of service distance to the address of the client by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

Because McCanne, McCanne.2 in view of Bhattacharjee fails to disclose all limitations of amended claim 1, applicants respectfully submit that claim 1, as amended, is not anticipated under 35 U.S.C. § 102(e) by McCanne 2, McCanne in view of Bhattacharjee.

Given that claims 3-9 and 11 contain limitations that are similar to those limitations discussed with respect to amended claim 1, applicants respectfully submit that claims 3-9 and 11 are not anticipated under 35 U.S.C. § 102(e) by McCanne.2, McCanne in view of Partridge.

Claims 1, 3-9, and 11-14 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,415,323 to McCanne (“McCanne”) in view of McCanne.2, in further view of Bhattacharjee. Applicants reserve the right to swear behind McCanne.

It is respectfully submitted that none of the references cited by the Examiner teaches or suggests a combination with each other. It would be impermissible hindsight, based on applicants’ own disclosure, to combine McCanne, McCanne.2, and Bhattacharjee.

As set forth above, neither McCanne, McCanne.2, nor Bhattacharjee discloses, teaches, or suggests mapping an address of the client to one or more addresses of information object repositories and to one or more addresses of routers that have a best type-of service distance to the address of the client by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

Furthermore, even if the proximity based redirection system of McCanne, content peering arrangement of McCanne.2, and application layer anycasting of Bhattacharjee were combined, such a combination would still lack mapping an address of the client to one or more addresses of information object repositories and to one or more addresses of routers that have a best type of service distance to the address of the client by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

Therefore, applicants respectfully submit that claim 1, as amended, is not obvious under 35 U.S.C. § 103(a) over McCanne, in view of McCanne.2, and further in view of Bhattacharjee.

Given that claims 3-9 and 11-14 contain limitations that are similar to those limitations discussed with respect to amended claim 1, applicants respectfully submit that claims 3-9 and 11-14 are not obvious under 35 U.S.C. § 103(a) over McCanne, in view of McCanne.2, and further in view of Bhattacharjee.

It is respectfully submitted that in view of the amendments and arguments set forth herein, the applicable rejections and objections have been overcome.

If there are any additional charges, please charge Deposit Account No. 022666.

Respectfully submitted,

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Date: 04/07/2008

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